



Jay Marshall Wolman, JD
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September 15, 2021

Via ECF and Email

Hon. Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007
Failla_NYSDChambers@nysd.uscourts.gov

**Re: *Pro Hac Vice Admission of Attorney Marc Randazza*
Cheng v. Guo | Case No. 1:20-cv-05678-KPF**

Dear Judge Failla,

I apologize for the multiple filings. We wish to make sure there is no doubt that we intended to file the letter of earlier today (ECF No. 25 & Exhibits at ECF No. 26) prior to counsel for the Legal Aid Society raising the issue with us. We want the Court to understand we did not file the letter as a response, but rather consistent with the intent of being forthright.


Attorney Crain sent us an e-mail at 2:00 p.m. Eastern time today advising of his intent to ask the Court to reconsider Mr. Randazza's *pro hac vice* admission.


Earlier, at 12:30 p.m., Mr. Randazza approved the filing of the letter, to be filed in this case and in *Cheng v. Guo*, Case No. 1:30-cv-05678. As our internal Slack messages indicate, I had reminded Mr. Randazza yesterday, September 14, that the letter we intended to file in those cases had not yet been filed as the screen shot pasted below shows:

sent


Thursday, September 9th ▾

Yesterday ▾

Jay Wolman 1:52 PM
 [@marcorandazza](#) i don't believe we ever got this on file:
<https://randaz.sharepoint.com/:w:/g/EQMzvL1ZOjVBp7TCqwf0x4kBT33xTxv-wPoMTecPB7CvyA?e=FeyhQS> i believe it was still awaiting your review




2021.08.18 JMW letter to Failla.docx
 Word Document from OneDrive and SharePoint



Added by OneDrive and SharePoint

Today ▾

Marc Randazza (Dude/His Dudeness) 12:30 PM
 [@wolman](#) file the leetter New

But for my having been in a deposition that ran unexpectedly long, this letter would have been filed prior to counsel's 2:00 e-mail.

The letter has now been filed in both cases (and there was no correspondence on the issue from opposing counsel in the *Cheng* matter). We hope that the Legal Aid Society is not going to attempt to argue that we only filed the earlier letter because of their e-mail, but, out of an abundance of caution, and to prevent the *pro hac vice* process from being used as a sword, we filing this letter to make it clear we, of our own volition, wanted to alert the Court to the accusation that Mr. Randazza's application was somehow improper. As noted in the letter, we believed the disclosures made at the time were those that the rules required.

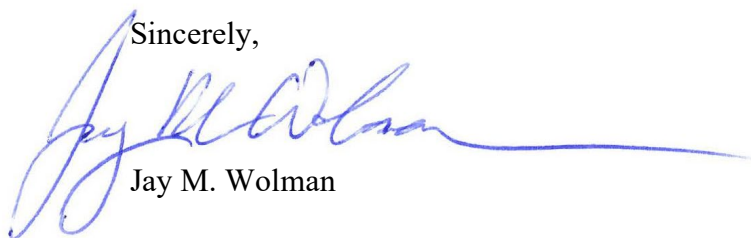
Randazza Legal Group
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LEGAL GROUP

Further, upon the mere shadow of doubt, it was our intention to raise it with the court ourselves.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jay M. Wolman", with a long horizontal flourish extending to the right.

Jay M. Wolman